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APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
CERTIFICATE OF CONVENIENCE AND
NECESSITY AUTHORIZATION AND
RELATED RELIEF FOR THE
ACQUISITION OF WIND GENERATION
FACILITIES

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PUBLIC UTILITY COMMISSION

OF TEXAS

GOLDEN SPREAD ELECTRIC COOPERATIVE INC.'S
SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY

TO: Southwestern Electric Power Company, by and through its attorney of record, William Coe and Kerry McGrath, Duggins Wren Mann & Romero, LLP, 600 Congress Avenue, Suite 1900, Austin, TX 78701; and

Rhonda C. Ryan, American Electric Power Service Corporation, 400 West 15th Street, Suite 1520, Austin, TX 78701

NOW COMES Golden Spread Electric Cooperative, Inc. ("GSEC") by and through its attorneys of record, and requests that Southwestern Electric Power Company ("SWEPCO") provide all the information requested and to answer under oath the questions propounded herein. The questions should be answered in the order in which they are asked and in sufficient detail to fully present all of the relevant facts.

Instructions

Please copy the question immediately above the answer to each and indicate at the bottom of each answer the name and job title of the person, other than counsel, chiefly responsible for preparation of the answer. Also state the name of the witness in this proceeding who will sponsor the answer to the question and who can vouch for the truth and veracity of the response given.

If any question appears confusing, please request clarification from the attorneys of record.

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If SWEPCO asserts that any documents responsive to any request have been discarded or destroyed and are thus not available, state when, and explain why any such document was destroyed or discarded and identify the person directing the destruction or discarding; provide all documents relating to any criteria or procedure of the company under which such document was discarded or destroyed.

If SWEPCO asserts documents are under claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipient, recipient of copies, subject matter of document, and the basis upon which such privilege is claimed. Please also further support the privilege that you claim, with reference to applicable decisions and Attorney General Opinions.

If SWEPCO asserts documents are protected from disclosure under the protective order, you must specifically state the provision of the Government Code that applies to the particular documents sought, and explain why the exception applies. A contention that information is excepted from disclosure in accordance with Section 552.101 should specifically identify the law, statute, or judicial decision that makes the information confidential. A contention that a document is protected under Section 552.104 or Section 552.110(b) requires a showing of some actual or specific harm in a particular competitive situation; a generalized allegation that a competitor will gain an unfair advantage will not suffice. ORD 541 at 4 (1990); ORD 661 at 5-6 (1999). A contention that a document is confidential under 552.110(a) should show that the information meets the definitions of a trade secret. ORD 552 at 2 (1990); ORD 402 (1983); Section 757, Restatement of Torts. as adopted by the Texas Supreme Court in *Hyde Corp. v. Huffines*, 314 S.W.2d 763, 776 (Tex.), *cert. denied*, 358 U.S.898 (1958). See also OR2002-3953 (2002).

These questions and requests are continuing in nature and should there be a change in circumstances, which would modify or change an answer supplied, then in such event you are requested to change or modify such answer under oath and to submit such changed answer as a supplement to your original answer.

DEFINITIONS

For the purpose of this request for information, the expressions set forth below shall have the following meanings:

(1) “SWEPCO” or “the Company” refers to Southwestern Electric Power Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

(2) “AEP” refers to American Electric Power, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representative, employees or other persons.

(3) “You,” “your,” “yours,” and “Company” refer collectively to SWEPCO and AEP, including its officers, directors, agents, attorneys, consultants, employees, representatives, any other person or entity acting or purporting to act on their behalf.

(4) “Application” refers to the Application and supporting testimony, schedules and other documents submitted by SWEPCO and AEP in PUC Docket No. 49737.

(5) “Document” and “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced or reproduced by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, including, but not limited to memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, electronic mail (email), cards, computer storage device or any other media, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche, drafts, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form, and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. “Document” or

“documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

(6) The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

(7) “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

(8) “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

(9) The term “concerning” or one of its reflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

(10) The term “including” or one of its inflections, means and refers to “including but not limited to.”

(11) “Relate to,” “regarding,” “concerning” and similar terms mean addressing, analyzing, referring, discussing, mentioning in any way, explaining, supporting, describing, forming the basis for, or being logically or causally connected in any way with the subject of these discovery requests.

(12) “Provide the basis,” “state the basis,” or “explain the basis” means provide all information on or describe every fact, statistic, inference, estimate, consideration, conclusion, study, and analysis known to SWEPCO/AEP that was relied upon in support of the expressed contention, proposition, conclusion or statement.

(13) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall be also taken to mean and include the plural.

(14) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

(15) If any document is withheld under any claim of privilege, please furnish a list identifying each documents for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

(16) If the response to any request is voluminous, please provide a detailed index of the voluminous material, pursuant to PUC PROC. R. 22.144(h)(4).

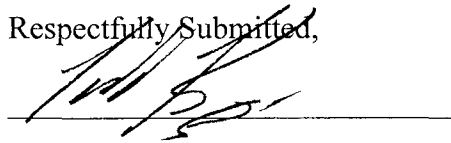
(17) If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bate Stamp page citations and detailed cross-references.

(18) "Commission" and "PUC" means the Public Utility Commission of Texas; and

(19) "Staff" means the professional staff of the PUC.

The requests for information are set forth on the attached list.

Respectfully Submitted,



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ATTORNEYS FOR GOLDEN SPREAD ELECTRIC
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PUC DOCKET NO. 49737

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION AND RELATED RELIEF FOR THE ACQUISITION OF WIND GENERATION FACILITIES	§ § § § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**GOLDEN SPREAD ELECTRIC COOPERATIVE INC.'S
SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

- GSEC 2-1.** Please refer to GSEC RFI 1-1. Which “Future” does the Company believe is more reflective of the amount of wind that is coming onto the SPP system? Please explain your response.
- GSEC 2-2.** Please admit that AEP has stated publicly that Future 2 is a more likely scenario. If deny, please describe AEP’s public statements regarding Future 2, including when and where such statements were made.
- GSEC 2-3.** Please refer to GSEC RFI 1-6. Please admit that Future 1 has underestimated the amount under predicted the amount of wind in SPP in the 2012 SPP ITP10, 2015 SPP ITP10, 2017 SPP ITP10, and the 2019 SPP ITP10.
- GSEC 2-4.** Please explain why AEP did not consider Future 2 in the analysis in this docket.
- GSEC 2-5.** Please admit that additional wind generation in SPP could decrease the economics of the Selected Wind Facilities. If deny, please provide any materials AEP relied upon to support the denial.
- GSEC 2-6.** Please refer to GSEC RFI 1-16.
- a. For Majestic:
- i. How much were the total upgrades associated with the firm transmission in total dollars and \$/kW?
 - ii. How much of the total upgrade cost was paid for by AEP in total dollars and \$/kW?
 - iii. What was the Commercial Operation Date (“COD”) of the project?

- iv. When was firm transmission requested?
- v. When was firm transmission granted?

b. For High Majestic:

- i. How much were the total upgrades associated with the firm transmission in total dollars and \$/kW?
- ii. How much of the total upgrade cost was paid for by AEP in total dollars and \$/kW?
- iii. What was the Commercial Operation Date (“COD”) of the project?
- iv. When was firm transmission requested?
- v. When was firm transmission granted?

c. For Flat Ridge 2:

- i. How much were the total upgrades associated with the firm transmission in total dollars and \$/kW?
- ii. How much of the total upgrade cost was paid for by AEP in total dollars and \$/kW?
- iii. What was the Commercial Operation Date (“COD”) of the project?
- iv. When was firm transmission requested?
- v. When was firm transmission granted?

d. For Canadian Hills:

- i. How much were the total upgrades associated with the firm transmission in total dollars and \$/kW?
- ii. How much of the total upgrade cost was paid for by AEP in total dollars and \$/kW?
- iii. What was the Commercial Operation Date (“COD”) of the project?
- iv. When was firm transmission requested?
- v. When was firm transmission granted?

GSEC 2-7. What factors will AEP rely on to determine when to request firm transmission service?

- a. Please admit that AEP will request firm transmission service as soon as possible if the CCN is granted by the Commission. If denying, please explain why.
- b. Please admit that AEP will consider the cost of firm transmission service when determining if it will accept the firm transmission service. If denying, please explain why.
- c. Please admit that the cost of the firm transmission service currently is not considered in the economic evaluation of the Selected Wind Facilities. If denying,

please provide all evidence of the inclusion of firm transmission service costs in the evaluation.

- d. If AEP is assigned costs as a result of the firm transmission service, please describe which AEP rate payers will be allocated this cost and how such costs will be allocated?
- e. What factors shape AEP's timing and decision to ask firm transmission for generation projects like the Selected Wind Facilities? Please provide all supporting documents.

GSEC 2-8. Will the proposed generation projects be eligible for Safe Harbor funding under the SPP OATT? If yes, please provide the number of megawatts entitled to Safe Harbor funding. Please explain your response and provide relevant supporting materials.